

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

EASTERN District of VIRGINIA

Division

TORI SMITH

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

JEHOVAH'S WITNESSES (JWs)  
NATIONAL ORGANIZATION OF WOMEN(NOW)  
W.E.A.V.E. OF SACRAMENTO, CA

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

1:22cv1319  
(to be filled in by the Clerk's Office)Jury Trial: (check one) ☐ Yes ☒ No

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	TORI SMITH
Street Address	2451 MIDTOWN AVE. APT. 417
City and County	ALEXANDRIA, FAIRFAX
State and Zip Code	VA 22303
Telephone Number	4437438805
E-mail Address	

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

Name	JEHOVAH'S WITNESSES ORGANIZATION (JWs)
Job or Title ( <i>if known</i> )	ATTN: LEGAL DEPARTMENT
Street Address	900 RED MILLS ROAD
City and County	WALLKILL ORANGE
State and Zip Code	NY 12589-3223
Telephone Number	845744-6000
E-mail Address ( <i>if known</i> )	jw.org

## Defendant No. 2

Name	NATIONAL ORGANIZATION OF WOMEN (NOW)
Job or Title ( <i>if known</i> )	
Street Address	1100 H STREET NW SUITE 300
City and County	WASHINGTON DISTRICT OF COLUMBIA
State and Zip Code	DISTRICT OF COLUMBIA
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 3

Name	W.E.A.V.E.
Job or Title ( <i>if known</i> )	
Street Address	1900 K ST.
City and County	SACRAMENTO SACRAMENTO
State and Zip Code	CA 95811-4187
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 4

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

E-mail Address (if known) \_\_\_\_\_

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) TORI SMITH, is a citizen of the  
State of (name) ALEXANDRIA, VA.

**b. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) JEHOVAH'S WITNESSES (JWs), is a citizen of  
 the State of (name) NEW YORK. Or is a citizen of  
 (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) NATIONAL ORG FOR WOMEN, is incorporated under  
 the laws of the State of (name) DISTRICT OF COLUMBIA, and has its  
 principal place of business in the State of (name) WASHINGTON, D.C. & NY.  
 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
 and has its principal place of business in (name) WASHINGTON, D.C..

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

YES. THE PLAINTIFF WILL NEED THE REMAINDER OF LIFE TO BE IN THE CARE OF MEDICAL PROFESSIONS.

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

THE PLAINTIFF IS A PRIVATE CITIZEN THAT HAS HAD SEVERAL FEDERAL CIVIL RIGHTS VIOLATED BY THE NAMED DEFENDANTS.

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

THE EXCESSIVE AMOUNTS OF DAMAGES (\$20 BILLION+) ARE DUE TO THE EXCESSIVE & EXTREME CRUEL & VICIOUS ACTIONS COMMITTED BY THE DEFENDANTS, THAT HAVE CONTINUED TO PRESENT DATE, AS NOTHING WAS EVER DONE TO PUT AN END TO THE DEFENDANTS. THE AMOUNTS SHOULD BE GRANTED IMMEDIATELY.


## V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/18/22

Signature of Plaintiff 

Printed Name of Plaintiff

TORI SMITH

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Street Address \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_

## COMPLAINT

1. This Federal Civil Lawsuit Complaint is brought before the court because, due to the extended intended duration/elongated (A lifetime of the Plaintiff's) of this case matter, is to be considered the worst case of racial hate crimes (female white racists supremacist/genocide complex vs. black female) and systemic abuses, enslavement (like slaves back in the deep south), neglect, etc. for the Plaintiff's life brought on and carried out by the Defendants. Therefore, under **Chapter 13, Civil Rights Section 241 & Title 18, U.S.C. Section 241**, the Defendants Conspired Against Rights of the Plaintiff, under **Chapter 13, Civil Rights Section 246** Deprivation of relief benefits, and **Chapter 21 Civil Rights Section 1983, Title 42 USC 1983** Civil Action Equal Rights under the Law and for the Deprivation of rights, and under **Chapter 13, Civil Rights Section 241 and 249** Defendants carried out Hate Crimes against the Defendant. Also, under **Chapter 21 Civil Rights Public Health and Welfare §2000c-8**.
2. This entire case matter involves the mens rea of the Original Defendant's gross deviant, depraved, obscene, obsessed horrid sexual abuses, fantasies, imaginations, etc. This was all part of the Original Defendants plans/plot: in their character assassination, Defaming and gross portrayals of the Plaintiff, along with the gross violations of the Plaintiff's Civil Rights, and Federal Civil Rights Laws. This Federal Civil Lawsuit reads in the manner of extreme cult members because of the deprivations of those that took part in carrying out, planning, and plotting such gruesome acts. (**Jim Jones and the Peoples Temple**) (**People vs. Manson Family**) **§1590. Trafficking with respect to peonage, slavery, involuntary servitude, or forced labor; 18 USC 1590**. The Original Defendants consisted of the Plaintiff's ex-husband, Ralph Everett Jr., along with his friends: Michael Morris, Horace Martin, Kenneth Hill, Nola Hill, Ava Brown, Arlene Hawkins – all Jehovah's Witnesses (JWs) located in Prince George's County and Montgomery County Maryland.
3. The Original Defendants invented debased, degrading, demeaning, lurid and violent sexual abusive histories of the Plaintiff's past to be vivid and live as if were real and still occurring until this very day. The Original Defendants described the Plaintiff's childhood as "being constantly raped by all of the male family members" of the Plaintiff's, and spread, "the Plaintiff's family made her a hole". The Original Defendants added further degrading, demeaning and gross sexual abuses, and further non-existing history into the Plaintiff's teen years, including: "the Plaintiff has been repeatedly raped, including gang rape(s)"; "the Plaintiff performs any lude sexual acts, anywhere, anytime"; "as an adult the Plaintiff was "the biggest ho, hole, slut, whore, etc." "it was her big ass, behind", etc. The Original Defendants claimed that "they have known the Plaintiff all her life. The Original Defendants never known, meet, nor had prior history of the Plaintiff before. This only came about when the Plaintiff filed for divorce.



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4. According to the Original Defendants, they were exposing the Plaintiff so no one would – befriend, employ – “Don’t bring/hire that big ho into your company!”, house, marry, impregnant (have a family), etc.”; “She is to get and have nothing!” This was all part of the Original Defendants’ declarations against the Plaintiff, more declarations were to follow, as the Original Defendants “never intended to be finish doing in” the Plaintiff.
5. The Ex-husband was a disgraced Elder that was forced to step down after being accused of being involved with other women. That was when the Plaintiff obtained a Legal Separation and relocated to Maryland from New York (See Exhibit 1). The Ex-husband never acknowledged the Legal Separation until he later claimed the Plaintiff was after his money. The Ex-husband was extremely angry at the Plaintiff because he blamed for “all of his problems”, including his being removed as a Congregational Elder. Hence, the Ex-husband decided to follow and pursued the Plaintiff, his then estrange wife, to Maryland, which led to the first Ex-Parte/Order of Protection (See Exhibit 2).
6. The Order of Protection was something that Original Defendant Michael Morris, with a legal background, advised the Ex-husband to ignore. The Order of Protection came under Domestic Violence. The Ex-husband felt that the Plaintiff did not deserve to “get on with her life”, as he had ruined his religious service. Unknown to the Plaintiff, at some point, the Ex-husband was involved in an auto accident and came into some money. The Ex-husband had decided that he wanted to get rid his then estrange wife, the Plaintiff, so that he could go on without her. The laws of the Jehovah’s Witnesses required a solid marriage or grounds for Divorce, period. The Ex-husband had neither. Hence, The Original Defendants devised a plot to ‘give the Plaintiff one last chance to drop the divorce and return back to her Ex-husband or else, the Plaintiff would lose her life, “we killed her dumb ass”. This was so the Plaintiff’s Ex-husband could return to the status of being a congregation Elder. “If the Ex-husband could no longer continue in his full capacity to serve, then the Plaintiff would not have a life to live.”
7. The Ex-husband, along with his friends, Original Defendants: Michael Morris, Horace Martin, Kenneth Hill, Nola Hill, Ava Brown, Arlene Hawkins – all Jehovah’s Witnesses (JWs) agreed, collaborated and coordinated to execute and “get rid of the Plaintiff, his then estrange wife. The Original Defendants were then determined and made it known that they “destroyed her body”, and “ruined her health”. The Ex-husband alerted the Plaintiff of a now greatly reduced state of being and health, including: mental and physical wellness as he taunted, “Can’t you at least get up and get a job making sandwiches?” Apparently, the Plaintiff had not been getting up, going out, moving around, etc., for some time. The Plaintiff was kept with the Ex-husband until he moved to his newly purchased condo; that way the Plaintiff could not receive medical attention. Then Original Defendant, Arlene Hawkins, took the Plaintiff to her home, so the Plaintiff would not be discovered in an abandoned apartment. The Original Defendants, in 2001, planned to carryout a vicious attack to leave the Plaintiff disabled. The Plaintiff was rendered unconscious, and physical injuries were inflicted. These injuries involved the Plaintiff’s: head (memory loss – —“we f\_cked her head”), hips, lower back, and sternum. Hence, the Plaintiff would have difficulties: moving, sitting, standing, walking, etc. The Plaintiff had no previous medical, mental, or physical health problems prior to this attack, poisoning, treatment, etc.

8. The Plaintiff had no previous medical or mental health problems, or accidents that resulted in leaving the Plaintiff disabled. The Plaintiff was not disabled when married the Ex-husband, nor was disabled when entering the Religion of Jehovah's Witnesses. The Original Defendants added their 'decree' of hate and how they wanted the Plaintiff to spend the rest of her life: being hated by all, having no family, having no friends, having no employment, having no money, having no housing or food. The Original Defendants wanted others to commit physical harm to the Plaintiff's body, damage or steal her property, and added, "no one allowed to help or save her". Further, the Original Defendants were looking for white racists to take over and "handle her dumb ass", etc.
9. These were the judgments passed against the Plaintiff according to the Original Defendants. Thus, the Original Defendants concluded that the Plaintiff deserved: to be abused, harassed, have no life, made a bum and hobo, walked around like a dog on a leash by any that wanted to take part "in the [killing] game". The Original Defendants then wanted other abusers and perpetrators to join in. The Original Defendants wanted to hear other Public participants: brag and boast about how "they got her ass too"; "they f\_cked her too"; "will keep f\_cking that big dumb ho, hole, big slut", etc. According to the Original Defendants, "this was to occur wherever she goes" "this will follow that big dumb ho everywhere, all her life". The Original Defendants had encouraged and invited the public to continue abusing and assaulting the Plaintiff until death "no one will save her"; "no one can stop us"; "it's what that big dumb ho deserves". This was when the Original Defendants called upon other Jehovah's Witnesses and the general Public to continue to endanger the Plaintiff safety.
10. This plot, devised by the Original Defendants, was to be executed by the vast number of members of the Jehovah's Witnesses Organization, as many were employed in many areas of employment – both in the government and private sectors (banks, hospitals, public transit, university, etc.). Hence, there are numerous Co-Defendants and Joiners involved and are listed by their companies of employment. (See Exhibit 3) For instance, Defendant Horace Martin worked at Prince George's Hospital Center, located at 3003 Hospital Drive Cheverly, MD 20785, approached the Plaintiff to identify himself. The Plaintiff was waiting for a friend in the Emergency Room and had no memory of Mr. Martin. After Mr. Martin identified himself to the Plaintiff, the Plaintiff recognized him as one her attacker and went to notify the on-duty Maryland PG County Police Officer. However, Mr. Martin was quick to instruct other Jehovah's Witnesses employees at the hospital to phone the police and falsely claim the Plaintiff of "destroying hospital property". The Plaintiff was surrounded by a huge number of police vehicles and nearly arrested. **Chapter 21 Civil Rights Public Health and Welfare §2000c–8.** At some time later, Original Defendant Horace Martin would boldly phone the Plaintiff's place of residence and leave her a voice message. The Plaintiff filed a harassment and stalking complaint against him. (See Exhibit 4).
11. The Plaintiff had employment in electrics and was being accused of wanting to divorce her now Ex-husband to pursue other men, "None of our wives would work with all those men nor do that kind of work.", per Original Defendant Michael Morris. The Plaintiff had the right to pursuit employment and not be banned, barred, nor excluded from employment for being a woman. **Chapter 21 Civil Rights Equal Employment Opportunity §2000e–2.**

12. The Plaintiff had to fight as a disabled person to still try to obtain employment to care for herself, obtain housing, have dental and medical care, etc. The Plaintiff was kicked out of the Maryland Department of Rehabilitation at the requests of the Original Defendants and not allowed to go back to relearn a skill to get back to being employed. The Plaintiff then enrolled at the University of Maryland University College (UMUC) to go back to school and learn and go back to being employed/have work. There the Plaintiff encountered a host of problems due to the presence of so many Jehovah's Witnesses employees at the University. For example, the Plaintiff experienced being harassed on the University of Maryland, College Park campus. One day while at the New Carrollton Metro, Original Defendant, Kenneth Hill saw the Plaintiff. Then Original Defendant Kenneth Hill struck her from behind and hurried away, just as Original Defendant, Michael Morris has done so, earlier. The Plaintiff filed an assault charge against him, as she had done so against Original Defendant Michael Morris. (See Exhibits 5 a - c) This was not on a busy metro platform, so he could claim he just bumped into her. The Plaintiff was waiting for a bus and standing alone. Also, Original Defendant Kenneth Hill worked on the University of Maryland campus, along with many other Jehovah's Witnesses that lead to herald throngs of outcries for the Plaintiff to leave the campus, insults, name calling, etc. whenever the Plaintiff was on the college campus. The Plaintiff had a right to attend the university. **CHAPTER 21-CIVIL RIGHTS SUBCHAPTER IV-PUBLIC EDUCATION 42 USC 2000c(c).** Many of Jehovah's Witnesses frowned against seeking higher education and viewed it as a waste of time, 'time that could be better spreading the good news'. Some years prior, unknown to the Plaintiff, the ex-husband began poisoning the Plaintiff to make her rather ill, to get her to stop attending school, claiming it would look bad on his being a congregational Elder. The Plaintiff had every right to go back to school and seek employment, as part of taking out student loans was with the view of paying back the loans via employment and not making a huge financial burden to create bad credit. (See Exhibit 6) At times, the Financial Aid Office would refuse to process the Plaintiff's Financial Aid at the University College (UMUC) to make it difficult for the Plaintiff not to transfer to another college.
13. The Original Defendants have/had requested the Public to maintain their falsehoods regarding any: information, mental status, physical health, etc.; including manufacturing: false statements, false psych evaluations, false personality traits, etc. about the Plaintiff. Again, the Plaintiff had no existing medical, mental, nor physical problems until the Original Defendants attack and poisonings.
14. The Original Defendants warned the Plaintiff to not go to seek medical help. There were to be no evidence and records of physical injuries suffered. Hence, the Plaintiff was harassed by employees, mainly Jehovah's Witnesses, at local hospitals: John Hopkins, Washington Hospital Center, George Washington Hospital, etc. All the Plaintiff's medical and mental health records have been to be altered, changed, or rewritten to reflect the Original Defendants' claims against the Plaintiff as: being abusive towards Ex-husband and others, an alcoholic, caused her own health ruin, drug user, depraved sex addict, smoker, etc. (See Exhibit 7)
15. Any visits to local doctors or medical hospitals, by the Plaintiff were to be labeled as "psychosomatic" or "hypochondriac" visits. (See Exhibit 8) The Plaintiff over the years has had to endure the removal of polyps and tumors and is now faced with cancer. For example, when the Plaintiff went in for back surgery at Inova Alexandria Hospital, on October 11, 2021, for the

removal of a damaged disc, inflicted by the Original Defendant's 2001 brutal physical attack, the Plaintiff's medical record had been altered with claims of the Plaintiff having COPD. The Plaintiff does not have COPD and was not under the care of a Dr. Baek for COPD. Still, there was to be no evidence of the original back injury, to this day. So, when the Plaintiff had to undergo back surgery, on 10/11/21, to replace the damaged disc, the Plaintiff's Medical Chart was filled with the following: Cardiac Patient, COPD, Emotional and Mental Problems and injuries stemming from Physical and Sexual Abuse and Stress from worries of having no food and ran out of food. The Plaintiff filed a Complaint with the Virginia Department of Health. **(See Exhibit 9)** The Plaintiff had/has maintained that her Ex-husband had fed her a toxic substance to stop her from going to school, back in 1990s. The toxins were absorbed into her cells/tissues, thus producing a host of medical problems: cancer, paralysis, polyps, neural, muscular skeletal problems, tumors, and other problems.

16. The Original Defendants still were not 'done' with the Plaintiff and were in pursuit of the Plaintiff's whereabouts, when the Plaintiff relocated to Washington, D.C., as the Original Defendants were looking for someone to sexual assault the Plaintiff. **(See Exhibits 10 a and b)** The Original Defendants would then accuse the Plaintiff of committing adultery, so her ex-husband would be free to go back to being an Elder, remarry, etc. The Plaintiff begun being harassed/having problems at a Washington, D.C. congregation, as they informed the Plaintiff that they were in total agreement with the Ex-husband's congregation. At the same time, Original Defendants were also looking for a racist group to 'hand the Plaintiff over to' (trafficked) so that the Plaintiff would never have peace, someone(s) harassing, trying to kill, put a stop to her life, for the rest of the Plaintiff's remanding life, be enslaved, "just like a slave from the deep old South".
17. The Plaintiff had informed the Jehovah's Witnesses (JWs) Headquarters, also known as(a/k/a) the Watchtower Bible and Tract Society and International Bible Students, located in Brooklyn, NY of problems with the Greenbelt congregation; then located in New Carrollton, MD, and relocated to Riverdale, MD, where the ex-husband was attending. The Brooklyn, NY headquarters were aware of problems between the Plaintiff and the Original Defendants. However, the headquarters chose to accept the Original Defendants account of "nothing going on", as victims are viewed as a liability that need to be got rid of or encouraged to stay as a member and pretend nothing ever happen. **(See Exhibit 11)** The Plaintiff would be harassed by others in the Brooklyn, NY location when simply sitting in a park or just walking pass Bryant Park in Manhattan, NY, where many Jehovah's Witnesses (JWs) gathered for their work. Other New York Jehovah's Witnesses (JWs), employees of the New York/New Jersey Transit Port Authority and Penn Station would call the Plaintiff degrading names. Many of the Jehovah's Witnesses (JWs) made it known to the Plaintiff and the Public that the Plaintiff was not welcome on the trains, platforms, nor the buildings of Penn Station, Port Authority, Grand Central, etc. The same has been true when the Plaintiff is in the Washington Metro Area, including Baltimore and Virginia. For instance, there were many JWs employees in companies **(ibid Exhibit 3)** such as: Bank of America, Department of Social Services, Washington Metropolitan Area Transit Authority (WMATA) **(See Exhibit 12)**, Giant, Safeway, Shoppers, Bates Garbage Removal, Social Security Administration, University of Maryland, U. S. Postal Services, U.S. Patent & Trademark



Campus, etc. The locations of these places of business covered MD, D.C., and VA. The Original Defendants planned to have others to continue to attack and spread false harmful malicious and vicious claims against the Plaintiff. As the Plaintiff would enter the building or was seen on the buses, platform, trains, walking, etc., loud shouts and name calling would take place along with threats: 'move, leave this place ho, slut', etc. (**Leichtman v. WLW Jacor Communications**)

18. The Plaintiff relocated to the West Coast. However since, the Maryland Prince George's County Police refused to investigate or make any arrests, the Original Defendants felt they got away with murder. The Original Defendants further retaliated against the Plaintiff for reporting against them and used their nationwide contacts to send hate messages to other Jehovah's Witnesses (JWs), so that while the Plaintiff was living in Sacramento, CA, the Plaintiff would have the same hate messages passed along, "no matter where the Plaintiff goes, this will follow", as Jehovah's Witnesses (JWs) are both national and international, as well.
19. One such hate group the Plaintiff encountered while living in Sacramento, CA was W.E.A.V.E. of Sacramento, CA. (**See Exhibit 13**) The President of W.E.A.V.E. accused the Plaintiff of "attacking her" and the Plaintiff "was going to pay for it", because "she could smell that n-word". The Plaintiff had never met the W.E.A.V.E. President or lived at the W.E.A.V.E. facility. This led to the Defendant W.E.A.V.E.'s President "giving orders" to have the Plaintiff's place of residence invaded and searched, by falsely claiming that the Plaintiff was "their dumb client" to gain access. The Plaintiff's place of residence was illegally entered by other W.E.A.V.E. clients. Then came death threats ("We will kill your black ass!"), harassments, stalking, threats of violence, etc. and being followed by other W.E.A.V.E. clients. The Defendant W.E.A.V.E. had no authority nor right as State of California employees to enter and search the Plaintiff's place of residence. **Chapter 21A Part B §2000aa-6 (2)**. The Plaintiff made a Police Report to the Sacramento Police Department. (**See Exhibits 14 a and b**) Unfortunately, while living in Sacramento, CA, the Comptroller's Office of Maryland, located in Baltimore, MD, placed a lien on the Plaintiff for no reason, as the Plaintiff was paying on a then tax bill. This was so the Plaintiff's credit would be ruined. The Plaintiff's bank account was shut down, etc. According to the Original Defendants, the Plaintiff was not to be able to relocate and seek housing.
20. The Plaintiff would be forced to return to the State of Maryland to take care of what was occurring. Still, while living in Sacramento, this gave the Defendants W.E.A.V.E. the ideal to bar the Plaintiff from seeking residence, as well, and become further involved in the Plaintiff's personal business, all being made public by the Original Defendants. The Defendants W.E.A.V.E. also pursued the Plaintiff on the Sacramento State College and demanded that the Plaintiff no longer be allowed on the Sac State College Campus, also adapted from the Original Defendants. The Plaintiff filed Injunctions against both Defendants Jehovah's Witnesses and W.E.A.V.E. (**See Exhibit 15 a - c**)
21. Further Complications occurred upon the Plaintiff's return to Washington, D.C. when the Plaintiff was followed by the Defendants W.E.A.V.E. The Defendants W.E.A.V.E. members falsely informed Defendants National Original of Women (NOW) that the Plaintiff was going to carry out some type of attack against the Defendants NOW and the Plaintiff needed to be stopped. The Defendants NOW declared war on the Plaintiff and vowed to never leave the Plaintiff alone. Both Defendants W.E.A.V.E. and NOW considered themselves to be very political with lots of

political: contacts, might, power, etc. The Defendants NOW falsely accused the Plaintiff of "being a spy" and would never "escape" them as the Defendant NOW is also international. The Defendants NOW's Abortion and Planned Parenthood affiliates and associates, as well, vowed the Plaintiff would never have children (as adapted from the founder Margaret Sanger in her eugenic [to limit births by those least able to afford children] genocidal mission against women of color, a violation of **18 USC 1091**) or get/have another man, employment, housing, etc. as well, also adapted from the Original Defendants, "We will be with her dumb ass until she's in her eighties!".

22. The Defendants NOW remembered the Plaintiff doing volunteer work at the NOW's Washington, D.C. headquarters. (See Exhibit 16) The Plaintiff was trying to see if Defendants NOW would make amendments to their Domestic Violence policies, they weren't. The Defendants NOW received information from the Original Defendants stating that the Plaintiff was still a Jehovah's Witness (enemies against abortions); and switched the Plaintiff to working on an upcoming Abortion March on the Capital Mall, but after the march that was the end of the Plaintiff volunteering in their office.
23. The Defendants NOW further vowed, "This will never end!" As a result, when the Plaintiff has relocated or simply traveled to other cities or states, mob sized crowds have amassed around the Plaintiff shouting, "We will never stop f\_cking the N-word!" along with shouting the Plaintiff was a ho, slut, whore, etc., again, as adapted from the Original Defendants. "We smell her black ass, that behind, that n-word, etc., as well". The Defendants NOW have stalked the Plaintiff in: CA, D.C., FL, KY, MD, NY, OH, SC, VA (Alexandria, Arlington, Fairfax, Richmond, & Virginia Beach). (See Exhibits 17 a – i) (See Exhibit 18)
24. The Defendants NOW arranged for the Plaintiff to be followed and harassed by other NOW members. The Defendants NOW also arranged for other invasions of the Plaintiff's places of residency. The Defendants NOW did this by means of abusing their authority, having powerful contacts, influence, members, etc., to go thru apartment management to arrange for cameras and listening devices to be install into the Plaintiff's bathroom, bedroom, kitchen, living room "to punish that n-word" for "being black" and "for being a big black dumb ho" "everyone will see your big black ass". Therefore, the Plaintiff could listen to the Public giving comments on the Plaintiff being in the bathroom, and at times telling the Plaintiff to be extremely careful; "They can't hear her sitting reading a book or what she is doing in the dark." According to Defendants NOW, "Everyone is going to know when it's your time of the month!" (Again, adapted from the Original Defendant's "Everyone will know when you on the rag ho, slut, etc.). The Defendants Now informed the Plaintiff, and "guaranteed" of no privacy in her bedroom, "We will all be able to see that ho in action with a man!"; another adaptation from the Original Defendant's reasons to follow and "see" what the Plaintiff would be doing in her place of residence, "to catch/see that big ho in action with other men". The Plaintiff has rights to Privacy. **Chapter 21A Civil Rights Privacy Protection.** The Defendants NOW arranged for drive-by shouting from vehicles in all neighborhoods the Plaintiff resided, by their many members and supporters, name calling out, "we don't want you living here", "you need to leave", etc. The



Defendants NOW members arranged for "road rage" to take place when the Plaintiff would be driving or to follow a Greyhound bus.

25. The Plaintiff would constantly be pursued from places of residences, many of which were homeless shelters for women (being unemployed, due to physical attack that led to disability, the Plaintiff had limited resources and places to go). (See Exhibit 19 a - c) This was the requests of the Original Defendants to keep the Plaintiff from seeking employment and obtaining a residence. Both Original Defendants Ava Brown and Nola Hill were both homeless, living in homeless shelters, street homeless, etc. The Plaintiff was the target of many women shelters staffers. These women's shelters were run by women that considered themselves supporters of the Defendants NOW or actual NOW associates, followers, members, etc. Hence, when the Plaintiff was forced to seek homeless shelters, a usual pattern of being harassed followed and end horribly: cops being called on the Plaintiff, the Plaintiff was to be put out, false reports of the Plaintiff's behavior, etc. All were meant to force to the Plaintiff to become street homeless, "So we can smell her stink butt with no place to bath or shower!" The situations got to the point that the Plaintiff had to file a court case against the Department of Homelessness Services (DHS) located in New York City. The Plaintiff listed Defendants NOW on the same claim. (ibid Exhibit 18)
26. The Plaintiff would soon discover that, while being admitted to a homeless shelter, the procedure was to follow the usual: accuse the Plaintiff of some sort of bizarre behavior, have staff members falsify the Plaintiff's mental status, make immediate claims that the Plaintiff belong in a Mental Facility and immediately placed on mental drug regulating medications, belongs in a group home, and to be put/thrown out along with the Plaintiff's belongings. (ibid Exhibit 7) The Plaintiff filed a court Claim against the New York City's Department of Homeless Services (DHS). However, the City of New York Legal Department represents many of the City's agencies: The New York Department of Homeless Services, the New York Commission on Human Rights, etc. The Plaintiff filed a lawsuit for damages without legal representation, as being unemployed the Plaintiff could not afford legal representation. (See Exhibit 21) New York Commissioner Agent Mr. Alvarez, was against/opposed to any homeless individual receiving any cash settlements to get into their own place and no longer be labeled as a homeless individual or being street homeless. He then advised Agent Ms. Kaur to drop the case. (See Exhibit 22) The Plaintiff filed the claim against the New York City Department of Homeless Services and New York City Human Rights Commission. The Defendant NOW was included on the claim. (ibid Exhibit 18).
27. The City of New York had provided no response. So, on the day that the Plaintiff was to file for Motion to Proceed to Judgement by Default, as soon as the Plaintiff entered the Supreme Court of New York building, located in Manhattan, NY, the Plaintiff was struck, from behind by a white female court officer and placed in handcuffs by a black female court officer. The Plaintiff was accused of striking an Officer of the Court and placed in a holding cell until the end of the Court date. (See Exhibit 23) There was no such record of such. The Plaintiff was placed in the holding cell to miss her court date and have her case dismissed. The Plaintiff was left to file a claim with the State of New York. (See Exhibit 24) The case matter was held in Albany, NY. The Plaintiff did not need to be present, as the New York State Attorney, Letitia James, pleaded that the Plaintiff,

"must have had done something wrong". (See Exhibit 25) The claim was dismissed. New York Attorney James was not present at the Courthouse when the incident took place.

28. The Plaintiff had to return to the State of Maryland, still the only place the Plaintiff has held a legal/valid state driver's license (See Exhibit 26 a and b). There the Plaintiff was later placed in a far more dire position when back in the State of Maryland. The Plaintiff had to stay back at the same women's shelter, Interfaith at Coffield Women's Homeless Shelter in Silver Spring, MD in Montgomery County. The Plaintiff was to be deliberately exposed to a positive COVID-19 person and then told to leave the shelter (See Exhibit 27). The same Interfaith Sophia's House Women's Homeless Shelter, in Rockville, MD Montgomery County, MD, years ago, called the Montgomery County Police on the Plaintiff. (See Exhibit 28)
29. The Defendants NOW members would follow the Plaintiff into Public Restrooms and make demands that the Plaintiff should be removed, "These white women don't want to be in or share the same restroom used by that black ho!" (A return to the days of Segregation for her black ass, as adapted from the Original Defendants, a violation of Chapter 21 Civil Rights Title III Sec. 301 (a) §2000b-2; Public Accommodations §2000a). Usually, that would result in a white female or mostly male Police officer knocking on the door of the bathroom stall demanding that the Plaintiff "come out immediately and leave".
30. The Plaintiff went to the Prince George's (P.G.) County Police many times, and even wrote letters to try to file police reports for the attempted murder, harassment, stalking, by Original Defendants Ex-husband and his friends. (See Exhibits 29 a - c) However, the Prince George's County Police decided to agree with the Original Defendants, that the Plaintiff, "must have been a big ho and slut" so there would be "no arrests and no investigations" and let them all the Original Defendants go. At times, while at the Prince George's County Police Headquarters, located on Palmer Drive., someone unseen would shout, "Get that slut out of here!" (The Plaintiff was advised that many of the Police opposing any arrests or reports were indeed friends and family member of Jehovah's Witnesses, the same was true of the P.G. County Court). The Plaintiff even wrote to the Prince George's County Police to get a response regarding filing police reports. (See Exhibit 30) The Plaintiff filed for Contempt of Protective Order, but they were dismissed with the claim of no witnesses. (See Exhibits 31 a - c)
31. The Plaintiff was barred and put out of the Court House in Upper Marlboro, MD by the then Prosecuting Attorney (P.A.) Ivey. An employee for the P.A., Mr. Artist, tried to get the Sheriff's Dept. to arrest the Plaintiff and had them escorted the Plaintiff out of the Court House, with the warning to never return. The Plaintiff filed claims with the High Commission office, but there knew to dismiss any claims filed by the Plaintiff. (See Exhibits 32 a and b) The Plaintiff had asked the then Prosecuting Attorney (P.A.) Ivey to forward her case to the U. S. Attorney's Office as the Defendants followed and pursued the Plaintiff as she moved from Maryland to Washington, D.C. The P.A.'s Office refused to do so. The State of Maryland then U.S. Attorney Rosenstein office would not allow the Plaintiff to file a complaint or investigate the matter. Hence, the Original Defendants 'felt as though they got away with murder' and were allowed to constantly pursue the Plaintiff and 'invited the Public' to join in attacking the Plaintiff. The Original Defendants would tell the Plaintiff as "for free to do whatever to her big behind dumb ass", as there would be no arrests, no stopping them, etc.". Had the Original Defendants would had

been arrested and prosecuted there would have been no further Civil Violations committed the Original Defendants and actions by Joiners, against the Plaintiffs Civil Rights. There never should have been an ongoing 'nightmare that would never end', 'to see it til the end' on the part of the Original Defendants against the Plaintiff.

32. There were no police report regarding attempted murder, plotting to commit murder of the Plaintiff, etc. filed in the State of Maryland against the Original Defendants. This included Prince George's County, Montgomery County, and even in the City of Baltimore, as the Plaintiff's was still being harassed and stalked at her last residence. The police would not allow the Plaintiff to file a police report, claiming this was only a matter of filing another Protection Order. Especially after, the Baltimore City Police kicked in the door of the Plaintiff apartment because the Plaintiff was listed as a criminal on the run. Accordingly, the Police Officer 'heard' the Plaintiff trying to 'make a getaway' from the ground floor. Hence, the door had to be kicked in and the apartment searched. There was no report. The Plaintiff was not home at the time. This action left the Plaintiff forced by the apartment management, to relocated to another apartment. For a second time, if the Plaintiff had not opened to door to the Baltimore City Police, the same would have occurred and possibly worst, as the Plaintiff was listed as harboring an armed and dangerous male criminal.
33. The only Police Report to be made would be against the Plaintiff when the Plaintiff had to travel back to Prince George's County for a college graduation that was not to be. Because this involved an encounter with one of the Original Defendants, Ava Brown. Apparently, Defendant Brown had boarded buses before, in the past, to stalk the Plaintiff. On that day, Defendant Brown followed the Plaintiff and got in the Plaintiff's face, while the Plaintiff was awaiting the bus stop. Then Defendant Ava Brown identified herself to the Plaintiff and a fight broke out. Unknown to the Plaintiff, Defendant Brown had 2 male assailants with her. One of the male assailants was trying to hold the Plaintiff while Defendant Brown was trying to hit the Plaintiff. As the Plaintiff turn to get off the male assailant, Defendant Brown managed to hit the Plaintiff's eyeglasses, causing harm to the Plaintiff's eye. The Prince George's Police remembered the Plaintiff and immediately arrested the Plaintiff with a list of various false charges. (See Exhibit 33)
34. This was an injury that the Prince George's Department of Corrections Jail tried to cover-up, until they could no longer do so. Thus, the Plaintiff had to go outside of the Jail to see an Ophthalmologist. The Plaintiff was forced to make a Guilty plea for assaulting Defendant Brown, to have a permanent criminal record. The Plaintiff's bail went from \$250 to \$25,000 overnight so that the Plaintiff could not be released and remained jailed. The Plaintiff was placed in solitary confinement for being extremely violent with Defendant Brown. Finally, at the hearing, the Plaintiff was told not to make in statements, in her own defense, or the Plaintiff would not be released from jail. Again, had the Original Defendants been arrested and prosecuted, the Plaintiff would have been able to get on with her life and nothing or the Plaintiff being 'passed' on to other abusers, Defendants, etc.
35. The Plaintiff was a private citizen and did not need to have her Civil Rights violated nor be exploited by two large organizations claiming that they were protecting their political and religious interests. The Plaintiff should have been placed in a Witness Protection Program to be

protected and kept safe, with so many attackers and attempts on her life, by members and supporter of two large organizations, namely, Jehovah's Witnesses (JWs) Organization and the National Organization of Women (NOW) **18 USC 1514: Civil action to restrain harassment of a victim or witness**. Instead, it was told to the Plaintiff that there would be no reports as proof so the Plaintiff could not seek damages or seek compensation. This is a violation of **Chapter 13, Civil Rights Section 246**. "They said she is to get nothing, we not going to give her ass a win!"; "This is all going to be on her big dumb ass!" "She will have to pay for it, it will cost her dumb behind!" The Plaintiff has a Civil Rights to report crimes, under **Title 18, U.S.C., Section 241 and 249**, has been repeatedly violated by the Defendants and Co-Defendants. The Plaintiff was not allowed to report hate crimes against the Defendants NOW due to interference from other Co-Defendants: "it's just a group of white women after her black ass".

WHEREFORE, the Plaintiff has filed this Federal Civil Rights Violations in the jurisdiction of Alexandria, VA, where the Plaintiff resides and is still being pursued, stalked, etc., and it has not been safe for the Plaintiff to live. The Plaintiff has filed this Federal Civil Rights Violation Lawsuit in the:

United States District Court

Eastern District of Virginia

401 Courthouse Square

Alexandria, VA 22314-5798

1. The Plaintiff is seeking to Judge to execute and preside jurisdiction over this Federal Civil Rights Violations Lawsuit as the Defendants are national and international organizations and have no respect for jurisdictions, states, etc., to order Restitution for the Plaintiff. The Plaintiff is asking for a speedy court process as the Plaintiff's Civil Rights have been violated long enough, to this day, to the point of the Plaintiff being made street homeless and needs restitution immediately.
2. The Plaintiff is asking the Judge to assign a Court Ordered Lawyer to assist in the Subpoenas of the Original Defendants and joined Defendants. The Defendants aim/goals for the Plaintiff was to be left living in Peonage (disabled, injured, and unemployed) and cannot afford a lawyer, court costs, criminologist, medical experts for expert medical testimony, legal fees, deliver and/or postal fees, or the costs to have Summons issued, as needed. Hence, the Plaintiff is asking the Judge for the Defendants to pay the costs. Legal costs and the Courts are expensive.
3. The Plaintiff has been forced to live with physical injuries and has incurred a lot of medical and physical therapies costs. Hence the doctors, hospitals, physical therapists, radiologists, etc. must be compensated. Medical care and treatments are not cheap and will be necessary for the remainder of the Plaintiff existence. (See Exhibits 34 a and b)
4. The Plaintiff needs a new identity and seek asylum in an unknown destination. The Plaintiff's identity has been greatly compromised, as well as the Plaintiff's computers and phones. Hence, the Plaintiff is asking the Judge to seal this court case. This Federal Civil Court Case matter is

Criminal in nature. Hence, the Plaintiff asks the presiding judge to turn this over to Federal Criminal Court as this matter has continued to present day, now entering the year 2022. The Plaintiff has been living under these extreme conditions since the year 2001.

5. Hence, the Plaintiff was meant to be "struck down during her prime" and these extreme living conditions were to continue until "old age" or "death" which ever came first, as declared by the Defendants, for the past 22 years, and due to the Plaintiff's age, the Plaintiff may not become gainfully employed. Therefore, due to the bodily damage and harm that has resulted in unusual growths (cancer, injury to lower lumbar, muscular skeleton chronic pain, polyps, tumors, etc.), including body size (BMI – 34.2) (See Exhibit 35 a and b), again the Plaintiff will need of long-term medical care and seeks the costs of such care which are costly. (ibid Exhibit 34) Therefore, the Plaintiff seeks past, present, and future damages for medical care.
6. The Plaintiff seeks restitution for permanent: housing, security, transportation, in a private location for the remainder of the Plaintiff's life.
7. The Plaintiff prays that the Judge will grant the Plaintiff's request total Restitutions from the main Defendants and the Co-Defendants, made payable by the Defendants and Co-Defendants by all and any combinations of the following: assets, confiscation of properties for sale for compensation, liens placed on bank accounts, insurance(s) for damages, etc.
8. Hence, the Plaintiff Restitutions relief requests are considerable as the Plaintiff needs the remainder of said life in permanent: care, security (safety), a private life in seclusion, treatments, etc. The Plaintiff seeks both compensatory and punitive damages from the combined Defendants that are part of large organizations for their political or religious interests (**Donald vs. United Klans of America Case No. 84-0725**). The Defendants meant for the Plaintiff to be human trafficked and passed along as, "The biggest ho, hole, slut, etc. forever!"; "If someone should stop doing this, then someone else will continue to take up the Defendants cause, or as stated, "we handled that ho to our [cruel, sadistic] kids!" "Out of the mouth of babes, will she be called a ho, slut, etc.". "Never leave her ass alone!" The Original Defendants and joined Defendants wanted the Plaintiff to be so hated, they sent their messages of hate to many communities and angered many. There was still to be someone(s) angry and believed the falsehoods were true and still need to be carried per the Defendants behalf and/or wishes.
9. The Plaintiff is seeking immediate relief under Civil Law Torts for the Restitution of the Prima Facie Violations and Volitions of Intentional, Negligent, and Strictly Liable acts of Assault, Battery, Intentional Infliction of Emotional and Mental Distress, regardless of any Appeal attempts by the Defendants as follows:
  - a. The amount of \$10 billion, made payable thru the forfeiture and seizure of bank accounts, buildings, liability insurances, properties, etc., as the Jehovah's Witness organization refuse to put an end to their negligence of members actions and joined allowed/joined for life. The Jehovah's Witnesses Organization will make claims of denial and of no liability or wrongdoing. However, the Jehovah's Witnesses Headquarter Organization has been ordered to pay millions for Sexual Abuses. These included payouts made under California AB 218 and the New York Child Victims Act. Hence, this demand for retribution should be



handled like other religious organization that have had to pay retribution for the actions of their clergy, laymen, member, priests, etc. (Catholic Church Sex Abuse, Archdiocese of Chicago & New York, and Pennsylvania Catholic Dioceses)

- b. The actions committed against the Plaintiff, being an Adult, carry the same culpability to commit great harm and offense.
- c. The amount of \$10 billion, made payable thru the forfeiture and seizure of bank accounts, liability insurances, membership dues, associates of abortion clinics and facilities, etc., as the National Organization of Women joined in and demand/request of members to persecute the Plaintiff for life.
- d. The amount of \$5 million, against the W.E.A.V.E. of Sacramento, CA, made payable thru liability insurance and the State of California.
- e. The \$139.650 million total amounts against in the List Co-Defendants. **(See Exhibit 36)**



Tori P. Smith

Pro Se